

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:	Case No. 23-13237-pmm
Tri-State Paper, Inc.,	Chapter 11
Debtor.	
Tri-State Paper, Inc.,	Adversary No. 23-00074-pmm
Plaintiff,	
v.	
HKGG, Inc.,	
Defendant.	

**Exhibit A
Declaration in Support of Plaintiff's Request for Entry of Default**

I, Michael I. Assad, declare as follows:

1. I am the attorney for Plaintiff Tri-State Paper, Inc. in the above-entitled action and I am familiar with the file, records, and pleadings in this matter.
2. The summons and complaint were filed on November 7, 2023.
3. The Defendant was served with a copy of the summons and complaint on November 7, 2023, as reflected on the docket sheet by the proof of service filed on November 7, 2023.
4. An answer to the complaint was due on December 7, 2023.
5. The Defendant has failed to appear, plead, or otherwise defend within the time allowed and, therefore, is now in default.
6. The Plaintiff requests that the clerk of court enter default against the Defendant.
7. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: December 8, 2023

/s/ Michael I. Assad
Michael I. Assad (#330937)